

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JEFFREY L. POMBERT,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	1:15-cv-00723-TWT
GLOCK, INC., et al.,)	
)	JURY TRIAL DEMANDED
Defendants.)	

**STIPULATED MOTION TO EXTEND DEFENDANTS' TIME TO
ANSWER AND TO ESTABLISH DEADLINES FOR THE PARTIES'
RULE 26 OBLIGATIONS**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), plaintiff Jeffrey L. Pombert and defendants Glock, Inc., Consultinvest, Inc., and Robert T. Core respectfully move the Court to extend defendants' time to answer and to set a deadline for the parties' Rule 26 obligations. In support of their joint request, the parties show the Court as follows:

1. Plaintiff Jeffrey L. Pombert filed the above-captioned action on March 11, 2015. Doc. 1.
2. The defendants filed motions to dismiss in response to the complaint, and on March 17, 2016, the Court granted in part and denied in part those motions.

3. Pombert and the remaining defendants listed above have agreed and hereby request that the Court extend the deadline for each of the remaining defendants to answer to April 29, 2016, which represents a 30-day extension of the current deadline. *See* Fed. R. Civ. P. 12(a)(4) (making answer due 14 days after notice of the court's denial of motion to dismiss). As the Court is aware, Pombert's 71-page Complaint includes 256 paragraphs of allegations that span several decades and involve alleged events around the world. The additional time will enable defendants to investigate and answer the allegations appropriately.

4. The parties agreed, and the Court previously ordered, that the parties' obligations to make initial disclosures, conduct the Rule 26(f) conference, and prepare a Joint Preliminary Planning Report would be deferred until after the Court ruled on the defendants' motions to dismiss. Doc. 9 at 1.

5. Since the Court's order on the motions to dismiss, the parties have conferred upon a schedule for completing their initial disclosures and their Joint Preliminary Planning Report, as ordered by the Court. *See* Doc. 9 at 1–2.

6. Upon conferral, the parties have agreed and hereby request that the Court order that (a) the parties make initial disclosures no later than May 13, 2016; (b) the parties submit their Joint Preliminary Planning Report no later than May 13, 2016; and (c) discovery will open May 30, 2016.

CONCLUSION

The parties, therefore, respectfully request that the Court extend the defendants' deadline to answer until April 29, 2016, and set the deadline to exchange initial disclosures at May 13, 2016, and the deadline to file the parties' Joint Preliminary Planning Report to May 13, 2016. In addition, the parties request that the Court order that discovery will open May 30, 2016. For the Court's convenience, a proposed order granting this relief is attached hereto as Exhibit 1.

Respectfully submitted, this 30th day of March, 2016.

For Plaintiff Jeffrey Pombert:

/s/John F. Salter

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CERTIFICATE OF SERVICE

I, hereby certify that on March 30, 2016, I electronically filed the foregoing **STIPULATED MOTION TO EXTEND DEFENDANTS' TIME TO ANSWER AND TO ESTABLISH DEADLINES FOR THE PARTIES' RULE 26 OBLIGATIONS** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel of record.

/s/ **Ronan P. Doherty**
Ronan P. Doherty